

1 Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
2 Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
3 2001 K Street, NW
Washington, DC 20006-1047
4 Telephone: (202) 223-7300
Facsimile: (202) 223-7420
5 Email: kgallo@paulweiss.com
Email: jsimons@paulweiss.com
6 Email: cbenson@paulweiss.com

7 Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
8 **TAYLOR & COMPANY LAW OFFICES, LLP**
One Ferry Building, Suite 355
9 San Francisco, California 94111
Telephone: (415) 788-8200
10 Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
11 Email: jpatchen@tcolaw.com

12 *Attorneys for Plaintiffs Sharp Electronics Corporation and*
Sharp Electronics Manufacturing Company of America, Inc.
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14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
15 **SAN FRANCISCO DIVISION**

16 In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Master File No. 3:07-cv-05944 SC
MDL No. 1917

17 This Document Relates To:

18 *Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,*
19 No. 13-cv-01173;

20 *Electrograph Sys., Inc. et al. v. Technicolor SA, et*
al., No. 13-cv-05724;

21 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*

22 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
23 No. 13-cv-05264;

24 *Target Corp. v. Technicolor SA, et al., No. 13-cv-*
05686;

25 *Interbond Corp. of America v. Technicolor SA, et al.,*
26 No. 13-cv-05727;

27 *Office Depot, Inc. v. Technicolor SA, et al., No. 13-*
28 *cv-05726;*

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF DIRECT
ACTION PLAINTIFFS'
ADMINISTRATIVE MOTION TO
ISSUE A LETTER OF REQUEST
FOR INTERNATIONAL JUDICIAL
ASSISTANCE TO PRODUCE
DOCUMENTS IN FRANCE**

1 *Costco Wholesale Corp. v. Technicolor SA, et al.*,
No. 13-cv-05723;

2 *P.C. Richard & Son Long Island Corp., et al. v.*
3 *Technicolor SA, et al.*, No. 13-cv-05725;

4 *Schultze Agency Servs., LLC v. Technicolor SA, Ltd.*,
et al., No. 13-cv-05668;

5 *Sears, Roebuck and Co. and Kmart Corp. v.*
6 *Technicolor SA*, No. 13-cv-05262;

7 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No.
13-cv-00157;

8 *Crago, et al. v. Mitsubishi Electric Corp., et al.*, No.
9 14-cv-02058.

10 I, Craig A. Benson, hereby declare as follows:

11 1. I am a Partner with the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP,
12 counsel for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing
13 Company of America, Inc. (collectively, "Sharp"). I am a member in good standing of the bars
14 of the State of Maryland, the State of New York, and the District of Columbia and on March 20,
15 2013 was granted leave to appear *pro hac vice*. Dkt. No. 12. I submit this Declaration in support
16 of Direct Action Plaintiffs' Motion to Issue a Letter of Request for International Judicial
17 Assistance to Produce Documents in France. I have personal knowledge of the facts stated
18 herein and could competently testify to these facts if called as a witness.

19 2. Attached hereto as Exhibit A is a true and correct copy of Thomson SA's
20 Responses to Direct Action Plaintiffs' First Set of Requests for Production of Documents, dated
21 May 14, 2014.

22 3. Attached hereto as Exhibit B is a true and correct copy of a letter provided to me
23 by Kathy Osborn on June 3, 2014, dated March 7, 2008, from E. Belliard to M.A. Debon,
24 Thomson SA.

25 4. Attached as Exhibit C is a true and correct copy of an unofficial English
26 translation of Exhibit B, as provided to me by Kathy Osborn on June 3, 2014.

1 5. Attached hereto as Exhibit D is a true and correct copy of a letter dated June 11,
2 2014, from Craig A. Benson to Kathy L. Osborn, counsel for Thomson SA, memorializing a
3 meet and confer that took place on June 4, 2014.

4 6. Attached hereto as Exhibit E is a true and correct copy of a letter dated July 14,
5 2014, from Kathy L. Osborn to Craig A. Benson re: *In re CRT Antitrust Litigation*, Case No. 07-
6 cv-5944-SC (N.D. Cal).

7
8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed this 28th day of July, 2014 in Washington, DC.

10
11 /s/ Craig A. Benson

12 Craig A. Benson
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